

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: LIQUID ALUMINUM SULFATE
ANTITRUST LITIGATION**

Civil Action No. 16-md-2687 (JLL)(JAD)
(MDL No. 2687)

*This Document Relates to: Putative Class of
Direct Purchaser Plaintiffs*

**DECLARATION OF JAMES H. MUTCHNIK IN SUPPORT OF DEFENDANT GEO
SPECIALTY CHEMICALS, INC.'S MOTION TO DISMISS**

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Attorneys for Defendant GEO Specialty Chemicals, Inc.

JAMES H. MUTCHNIK, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am member of the law firm of Kirkland & Ellis LLP, which represents Defendant GEO Specialty Chemicals, Inc. (“GEO”). I submit this Declaration in support of GEO’s Motion to Dismiss the Direct Purchaser Plaintiffs’ Consolidated Amended Complaint (Dkt. 220) with prejudice as to claims relating to any conduct prior to December 31, 2004.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Debtors’ Third Modified Joint Plan of Reorganization Under Chapter 11, Title 11, *In re GEO Specialty Chemicals, Inc., et al*, Case No. 04-19148 (MS) (Bankr. D. N.J. Nov. 22, 2004) (Dkt. 887).

3. Attached hereto as Exhibit 2 is a true and correct copy of the Order Confirming Debtors’ Third Modified Joint Plan of Reorganization Under Chapter 11, Title 11, *In re GEO Specialty Chemicals, Inc., et al*, Case No. 04-19148 (MS) (Bankr. D. N.J. Dec. 20, 2004) (Dkt. 1014).

4. Attached hereto as Exhibit 3 is a true and correct copy of certain excerpts of the Affidavit of the Trumbull Group, L.L.C., *In re GEO Specialty Chemicals, Inc., et al*, Case No. 04-19148 (MS) (Bankr. D. N.J. Jan. 25, 2005) (Dkt. 1073).

5. Attached hereto as Exhibit 4 is a true and correct copy of the Affidavit of the Trumbull Group, L.L.C. Regarding Publication of Debtor’s Notice of Bar Date for Filing Proofs of Claim or Interest, *In re GEO Specialty Chemicals, Inc., et al*, Case No. 04-19148 (MS) (Bankr. D. N.J. July 26, 2004) (Dkt. 493)

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 21, 2016.

s/ James H. Mutchnik
James H. Mutchnik